

THE HONORABLE TANA LIN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ROBERT CLARK, individually and on behalf
of all others similarly situated,

Plaintiff

v.

WHITEPAGES, INC, a Delaware
corporation,

Defendant.

CASE NO. 2:25-cv-00810-TL

**STIPULATED MOTION AND
[PROPOSED] ORDER TO EXTEND
DEFENDANT WHITEPAGES, INC.'S
DEADLINE TO ANSWER OR
OTHERWISE RESPOND TO THE
COMPLAINT**

**NOTE FOR MOTION CALENDAR:
Tuesday, May 6, 2025**

1 Pursuant to Local Civil Rules 7(j) and 10(g), plaintiff Robert Clark (“Plaintiff”) and
2 defendant Whitepages, Inc. (“Whitepages”), by and through their undersigned counsel, hereby
3 stipulate and respectfully request that the Court extend the time for Whitepages to answer or
4 otherwise respond to Plaintiff’s Class Action Complaint (“Complaint”) (Dkt. # 1-2) by thirty-five
5 (35) days, to June 13, 2025.

6 Plaintiff filed his Class Action Complaint in King County Superior Court on April 10,
7 2025. (Dkt. # 1-2). On May 2, 2025, Whitepages filed its Notice of Removal to this Court. (Dkt.
8 #1). Whitepages’s current deadline to respond to the Complaint is May 9, 2025. Counsel for
9 Plaintiff and counsel for Whitepages have met and conferred, and Plaintiff agreed to an extension
10 for Whitepages of not more than thirty-five (35) days to answer, move, or otherwise respond to
11 the Complaint. Whitepages has not previously requested, nor has Plaintiff previously granted, an
12 extension of time to respond to the Complaint. This extension will not affect any other deadlines
13 in the case.

14 The extension will allow the parties to discuss the proper forum for this action, including
15 whether the case should proceed in arbitration.

16 This stipulation and order shall not operate as an admission of any factual allegation or legal
17 conclusion, nor shall it operate as a waiver of, or otherwise affect, any right, defense, claim, or
18 objection.

19 THEREFORE, for the reasons stated above, the parties request that the Court enter an
20 Order extending Whitepages’s deadline to answer or otherwise respond to the Complaint to June
21 13, 2025.

RESPECTFULLY SUBMITTED this 6th day of May, 2025.

The undersigned certify that this motion contains 254 words, in compliance with the Local Civil Rules.

EMERY REDDY, PLLC

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By: /s/ Timothy W. Emery

By: /s/ Kimberlee L. Gunning

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Attorneys for Plaintiff Robert Clark

Attorneys for Defendant Whitepages, Inc.

[PROPOSED] ORDER

IT IS SO ORDERED this _____ day of May, 2025.

THE HONORABLE TANA LIN
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically with the Clerk of the Court using the CM/ECF system on May 6, 2025 and was served via the Court's CM/ECF system on all counsel of record.

DATED this May 6, 2025.

/s/ Kimberlee L. Gunning
Kimberlee L. Gunning, WSBA No. 35366